

ORIGINAL

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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII  
APR 29 2008  
at 4:47 PM  
SUE OLIVA, CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JEANNE K. ENDO, ) CIVIL NO. 03-00563 LEK  
 )  
Plaintiff, ) PLAINTIFF'S PROPOSED CONCISE  
 ) STATEMENT OF THE CASE;  
v. ) CERTIFICATE OF SERVICE  
 )  
UNITED PUBLIC WORKERS, AFSCME )  
LOCAL 646, AFL-CIO, )  
 )  
Defendant. )  
UNITED PUBLIC WORKERS, )  
AFSCME LOCAL 646, AFL-CIO, )  
 )  
Third-Party Plaintiff, )  
 )  
v. )  
 )  
GARY W. RODRIGUES, )  
 )  
Third-Party Defendant. ) TRIAL DATE: May 13, 2008

**PLAINTIFF'S PROPOSED CONCISE STATEMENT OF THE CASE**

Plaintiff Jeanne K. Endo, by and through her counsel, hereby  
submits her Proposed Concise Statement of the Case:

Plaintiff, Jeanne K. Endo, has been an  
employee of Defendant UNITED PUBLIC WORKERS,  
AFSCME LOCAL 646, AFL-CIO ("UPW"). Plaintiff  
alleges that during the period Third-Party  
Defendant Gary W. Rodrigues ("Rodrigues") was  
the State Director for the UPW, and

Plaintiff's supervisor, she was subjected to hostile work environment sexual harassment.

In addition, Plaintiff alleges that she was subjected to unlawful reprisal when she refused or resisted Rodrigues' alleged sexual advances, and filed a discrimination complaint against the UPW with the Equal Employment Opportunity Commission and Hawaii Civil Rights Commission.

DATED: Honolulu, Hawaii, April 29, 2008.



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CLAYTON C. IKEI  
JERRY P.S. CHANG

Attorney for Plaintiff  
JEANNE K. ENDO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JEANNE K. ENDO,	)	CIVIL NO. 03-00563 LEK
	)	
Plaintiff,	)	CERTIFICATE OF SERVICE
	)	
v.	)	
	)	
UNITED PUBLIC WORKERS, AFSCME	)	
LOCAL 646, AFL-CIO,	)	
	)	
Defendant.	)	
_____	)	
	)	
UNITED PUBLIC WORKERS,	)	
AFSCME LOCAL 646, AFL-CIO,	)	
	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
GARY W. RODRIGUES,	)	
	)	
Third-Party Defendant.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the  
forgoing document was duly served upon the following parties at  
their last known address U.S. Mail, postage prepaid on April 29,  
2008:

TO: ERIC A. SEITZ, ESQ.  
LAWRENCE I. KAWASAKI, ESQ.  
820 Mililani Street, Suite 714  
Honolulu, Hawaii 96813

Attorneys for Third Party  
Defendant Gary W. Rodrigues

AND

JAMES E.T. KOSHIBA, ESQ.  
CHARLES A. PRICE, ESQ.  
KOSHIBA AGENA & KUBOTA  
2600 Pauahi Tower  
1001 Bishop Street  
Honolulu, Hawaii 96813

Attorneys for Defendant  
UPW, AFSCME, LOCAL 646, AFL-CIO

DATED: Honolulu, Hawaii, April 29, 2008.



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CLAYTON C. IKEI  
JERRY P.S. CHANG

Attorneys for Plaintiff  
JEANNE K. ENDO